

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MARK REAVES,)	
)	
)	
Plaintiff,)	
v.)	CIVIL ACTION NO. 04-30125-MAP
)	
MASSACHUSETTS ARMY NATIONAL)	
GUARD and ADJUTANT GENERAL)	
RAYMOND A. VEZINA)	
)	
Defendant(s).)	
)	

PLAINTFFS' DISCLOSURE OF TRIAL EXPERT

Plaintiff Mark Reaves designates the following individual as a possible trial expert;

1. Thomas M. Martin, Ph.D.
Former Commander, Forensic Toxicology Drug Testing Laboratory.
Tripler Army Medical Center
2. The subject matter on which Dr. Martin is expected to testify to is that of knowing versus unknowing ingestion of cocaine, specifically, is a BZE concentration of 249ng/mL consistent with a service member unknowingly ingesting cocaine.
3. The substance of the facts and opinions on which Dr. Martin is expected to testify is based on a "Memorandum for Record" dated August 8, 2006 with a subject line entitled "Expert Opinion." A copy of which is attached.
4. The subject "Memorandum for Record" was drafted approximately twelve years ago. Plaintiff is still in the process of locating Dr. Martin who no longer works at Tripler Army Medical Center. When Dr. Martin is located plaintiff

will furnish the defendant with further information pursuant to Fed. R. Civ. P.
26(a)(2).

Dated: July 24, 2008

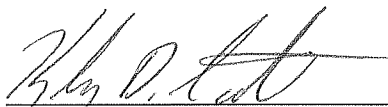
Tully Rinckey P.L.L.C.
Attorneys for Plaintiff

By: 
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CERTIFICATE OF SERVICE

I, Kiley D. Scott, attorney for the Plaintiff, hereby certify that this document, filed through the Electronic Case Files system, will be, on this 24th day of July, 2008, sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing and mailed in paper copy form, by first class mail, postage prepaid, to those indicated non-registered participant(s).


Kiley D. Scott, Esq.